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DAVID D. WILSON
ASSOCIATE COUNSEL
LEGAL DEPARTMENT

February 22, 1991

FEDERAL EXPRESS

Ms. Joan Armstrong
USEPA
PRP Search Section (3HW11)
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms. Armstrong:

Re: Berks Landfill - Sinking Spring, PA

This letter will respond to Mr. Peter W. Schaul's letter dated January 29, 1990 and received February 11, 1990, requesting additional information related to the Berks Landfill, Sinking Spring, Pennsylvania. My letter to Mr. Schaul of November 14, 1990, responded to his October 18, 1990 letter which had initially requested information regarding this Site. This earlier response will hereinafter be referred to as ("Armstrong's November 14, 1990 Response").

The responses set forth in this letter are numbered to correspond to the similar numbering used in Mr. Schaul's January 29, letter.

1. Q: During the course of its investigation with respect to the Site, EPA obtained information which indicates that a) wastes were hauled to the Site in green tractor trailers. EPA requests that Armstrong confirm or deny this information; b) wastes were described as a brown, gluey substance which emitted a strong linoleum, oil-based smell, that smelled like paint, but was not paint. EPA requests that Armstrong confirm or deny this information. In addition, please state the following:

A: Armstrong's November 14, 1990 Response is reaffirmed.

(a) Our investigation indicates that Armstrong never hauled, nor does it have any information that its wastes were hauled by others to the Site, in green

tractor trailers during the period of 1950-1986 or any other time period. If the question infers that

USEPA has information which indicates that Armstrong hauled any wastes or any of its wastes were hauled to the Site in green tractor trailers, Armstrong denies this information.

(b) Armstrong is unable to identify any wastes it may have generated as a "brown, gluey substance which emitted a strong linoleum, oil-based smell that smelled like paint, but was not paint." No waste profiles, analysis, or other means of identification were available nor any visual recollection to make such a correlation. It is more likely that liquid or semi-solid wastes generated by Armstrong possessing an odor would have possessed a solvent-type odor. (Perhaps the paint-like substances described in Mr. Schaul's letter were in fact paint residues, in which case no correlation can be made to wastes generated by Armstrong.)

If the question infers that USEPA has information which indicates that Armstrong hauled any such wastes or any of Armstrong's wastes were hauled to the site, Armstrong denies this information.

1a. Q: Describe the process which generates or generated the brown, gluey substance;

A: Armstrong is unable to identify any waste stream by the description "brown, gluey substance" and therefore is unable to describe any process which generates such a substance.

1b. Q: Provide the constituents of the brown gluey substance. The information provided should include the chemical composition, physical state (solid, liquid, gas), and any analysis that was performed on such substance; and

A: Armstrong is unable to identify any waste stream by the description "brown, gluey substance" and therefore is unable to describe any process which generates such a substance.

1c. Q: Describe Armstrong's tractor trailers as identified in Armstrong's November 14, 1990 response, which is attached, specifically, the color, any markings on the trucks (logos and lettering), and any special devices or machinery on the truck. Include a description

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of any other tractor trailers owned by Armstrong besides those identified in the November 14, 1990 letter.

A: Armstrong's November 14, 1990 Response may have been somewhat misleading as to the description of its trucks which hauled solid waste to local landfills. Subsequent inquiry indicates that the trucks were dump-type trucks which were loaded at the Lancaster Plant from a ram compacter unit at the plant--not tractor trailers. The trucks did not have trailers with ram devices to push the solid waste out of the trailer as previously described. Rather, I am now advised the solid waste was compacted by a ram device at the plant and was loaded on green colored dump trucks which would have tilting beds for unloading. No information was developed as to whether the cabs of these green trucks had lettering on the door with the name "Armstrong" or whether they were totally green. However, the truck bodies were remembered to have been solid green without other lettering. Again, the task of these trucks was to transport solid waste--scrap, paper, cartons, wood, etc.--not any liquid or semi-liquid, (which could not have been contained in a truck bed). Again, the same individuals who were referred to in Armstrong's

November 14, 1990 Response who would be knowledgeable of this subject matter again confirmed that no Armstrong trucks took wastes to the Site nor was there any knowledge of Armstrong waste being transported to the Site by others.

1d. Q: For each tractor trailer identified in "c" above, describe the purpose and/or use of each tractor trailer.

A. See answer to Item 1c above.

2. Q: Prior to June of 1980, when Armstrong entered into a contractual relationship with Stabatrol Corporation, who disposed of Armstrong's waste as described in Enclosure 15 (marked confidential) of Armstrong's November 14, 1990 response. Further provide:

- a. The ultimate disposal location of such wastes; and;
- b. The documents evidencing the information provided in

2a.

A. As stated in Armstrong's November 14, 1990 Response (last paragraph on page 4), materials containing hazardous wastes were shipped to Scientific Chemical Processing ("SCP"), a New Jersey-based waste disposal company in the Newark area prior to June 1980. Solid, non-hazardous wastes were locally hauled by Armstrong to Creswell Landfill.

The SCP shipments were either sent to Carlstadt or Wilson Avenue, Newark sites by SCP during this time frame. Since 1985, Armstrong has been a party to Administrative Orders on Consent for the Carlstadt and Newark sites along with approximately 150 other companies who as PRP's are funding Superfund clean ups of these sites. In addition, it is alleged by USEPA that wastes which were sent to SCP at Carlstadt or Newark may have been transhipped by SCP to the Lone Pine Landfill at Freehold, New Jersey, and thus Armstrong is a PRP at that site. A complete and lengthy submission of all documents evidencing shipments to these locations was submitted to USEPA Region II in March 1985 and is of record in proceedings for these sites. No other records of shipments to other sites exist prior to June 1980 when RCRA manifesting requirements became effective. Should copies of these shipping documents be necessary for your investigation in order to verify this statement, we can provide them, but I hesitate to incur the cost of duplicating the volume of paper which has already been submitted to USEPA Region II and contained confidential portions.

Please accept this letter as Armstrong's confirmation of its earlier response that its investigation of this matter has produced no information that it ever sent wastes to the Site. Again, we request that if you come across more definitive information which can be used to further investigate this matter, Armstrong is willing to fully cooperate. If you have any further questions, please feel free to contact me.

Sincerely,



SLP

